IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

SECURITIES AND EXCHANGE	§	
COMMISSION,	§	
	§	
Plaintiff,	§	
	§	
V.	§	No. 3:08-CV-1687-M
	§	
RYAN M. REYNOLDS,	§	
DESMOND J. MILLIGAN,	§	
JASON W. BROLA,	§	
TIMOTHY T. PAGE,	§	
MARKET 99, LTD. f/k/a eCarfly, Inc.,	§	
TRYST CAPITAL GROUP, L.L.C.	§	
GRIFFDOM ENTERPRISES, INC.	§	
TESTRE, L.P., and	§	
BELLATALIA, L.P.,	§	
	§	
Defendants.	§	

UNITED STATES OF AMERICA'S UNOPPOSED APPLICATION FOR STAY OF PROCEEDINGS

The United States of America ("the United States"), by and through the United States Attorney for the Northern District of Texas, respectfully applies for a stay of these proceedings pending completion of a parallel criminal investigation and anticipated prosecution ("the criminal matter"). The government files this application to avoid prejudice to the criminal matter, which shares common witnesses, evidence, and legal and factual issues with this civil action. As set forth in the accompanying Memorandum in Support of Unopposed Application for Stay of Proceedings, the relief sought by this

application is consistent with governing case law, and the parties to this civil action do not oppose a stay. Accordingly, the United States respectfully applies to the Court for entry of an order staying this proceeding pending completion of the criminal matter.

Respectfully submitted,

JAMES T. JACKS Acting United States Attorney

/s Alan M. Buie
ALAN M. BUIE
Assistant United States Attorney
Texas Bar No. 783751
1100 Commerce Street, Suite 300
Dallas, Texas 75242

Telephone: 214.659.8600 Facsimile: 214.767.4104 alan.buie@usdoj.gov

CERTIFICATE OF CONFERENCE

I hereby certify that on April 3, 2009, I conferred with the following counsel of record, and that each stated he or she is not opposed to the relief requested by the foregoing motion:

Leslie J. Hughes, Esquire For Plaintiff Securities and Exchange Commission

David A. Carp, Esquire For Defendants Ryan M. Reynolds and Bellatalia, L.P.

John Courtade, Esquire For Defendants Timothy T. Page and Testre, L.P.

I did not attempt to confer with the following named defendants, each of which has defaulted, as evidenced by the Clerk's entry of default as to each on February 25, 2009:

Market 99, Ltd. Griffdom Enterprises, Inc. Jason W. Brola Tryst Capital Group, LLC Desmond J. Milligan

/s Alan M. Buie
ALAN M. BUIE
Assistant United States Attorney

CERTIFICATE OF SERVICE

I caused a true copy of the foregoing motion to be served on the following counsel of record by way of the Electronic Court Filing system on April 8, 2009:

Leslie J. Hughes, Esquire For Plaintiff Securities and Exchange Commission

David A. Carp, Esquire For Defendants Ryan M. Reynolds and Bellatalia, L.P.

John Courtade, Esquire For Defendants Timothy T. Page and Testre, L.P.

I did not attempt to serve the following named defendants, each of which has defaulted, as evidenced by the Clerk's entry of default as to each on February 25, 2009:

Market 99, Ltd. Griffdom Enterprises, Inc. Jason W. Brola Tryst Capital Group, LLC Desmond J. Milligan

/s Alan M. Buie
ALAN M. BUIE
Assistant United States Attorney